

Exhibit A

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION

MARIAN SNOW

Plaintiff,

-v-

CLIENT SERVICES, INC.

Defendant

No. 5:15-cv- 419-D

AFFIDAVIT OF MARIAN SNOW IN SUPPORT OF FEDERAL COMPLAINT

NOW COMES the affiant, Marian Snow, and after being duly sworn, does depose and says as follows:

1. I am Marian Snow, previously known as Marian Snow Gibbons, and I am more than eighteen years of age and am otherwise competent to give testimony contained herein.

2. My telephone number ending in -9170 is assigned to a cellular telephone service and my telephone number ending in -8462 is assigned to RingCentral, which is a cloud-based service in which the called party is charged for the call.

3. The calling plan for my RingCentral account functions, and functioned in 2012, by having me pre-purchased calling credits from which usage for every incoming and outgoing call is deducted, whether the call is forwarded, answered, goes unanswered or results in the recording of a voicemail message.

4. Prior to September 2012, I had previously been obligated or allegedly obligated to an amount due or alleged to be due on a credit card that arose from transactions that had been incurred primarily for personal, family, or household purposes.

5. On September 7, 2012, at approximately 10:25 am, I received a call from (800) 521-3236 to my telephone number ending in -8462. I told the caller to please not contact me by telephone.

6. I consulted the Internet to investigate (800) 521-3236 and found the number likely did belong to Client Services, Inc. and further consulted the Better Business Bureau to locate a mailing address for the company.

7. That day, I composed a letter to Client Services, Inc. ("CSI") to document my request by telephone and to reiterate that they assist me in reducing my costs by only communicating with me in writing, and that they not call me at any phone number. (I have attached a copy of said letter herewith, marked "Exhibit A", as the original was signed and mailed,)

8. Therefore, on September 7, 2012, by both telephone and in writing, I withdrew any and all consent, express or implied, that CSI may have possessed or allegedly possessed to call me at any telephone number.

9. I continued to receive more and continuous calls from CSI beginning September 10, 2012 and continuing through January 4, 2013.

10. After I had requested, both verbally and in writing, not to be called and to receive all communication in writing, I continued to receive at least 31 more calls from CSI to my telephone numbers, which included calls from (800) 521-3236, (913) 971-0327 and from (636) 947-2321.

11. I received at least 20 voicemail message recordings from CSI at my telephone number ending in 8462 and though I did hear the callers identify calls as being from Client Services, Incorporated, I never heard any caller disclose the person or business on whose behalf the collection agency is acting or to whom the debt is owed.

12. The calls that I answered and the voice mail messages that I received and heard began with a pause before the caller began speaking.

13. Additionally, I received calls on my cellular telephone ending in -9170 on December 12, 2012 at approximately 7:07pm, on December 26, 2012 at approximately 4:47pm, on January 3, 2013 at approximately 12:07pm, on January 3, 2013 at approximately 2:54pm and on January 4, 2013 at approximately 9:12am from CSI at number (913) 971-0327. In these calls, the caller did not disclose the person or business on whose behalf the collection agency is acting or to whom the debt is owed.

14. In one call, I asked the caller for the identity of the company on whose behalf he was calling, whereupon he asked me for my social security number. I believed he had no right to my personal information and told him to stop calling me.

15. I believe that this civil Complaint is well grounded in fact and warranted by existing law.

16. I believe that this civil Complaint is not interposed for any improper purpose, such as to harass the Defendant, cause unnecessary delay to the Defendant, or create a needless increase in the cost of litigation to the Defendant named in the Complaint.

17. I have filed this Complaint in good faith and solely for the purposes set forth in it.

18. The exhibit attached to this complaint is a true and correct copy of the original.


Pursuant to 28 U.S.C. § 1746(2), I, MARIAN SNOW, hereby certify, under penalty of perjury, that the foregoing is true and correct.


Marian Snow

STATE OF ALABAMA

COUNTY OF TUSCALOOSA

Sworn to and subscribed before me, this 19th day of August 2015.



Notary Public

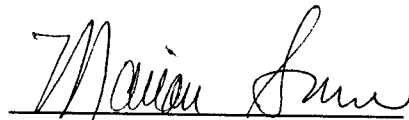
My Commission Expires: 08/26/2017

CERTIFICATE OF SERVICE

The undersigned hereby certifies that she served the foregoing document on the following US Postal service, Postage Prepaid, as follows:

CLIENT SERVICES, INC.
c/o CT Corporation System
150 Fayetteville Street
Box 1011
Raleigh, NC 27601

This 19th day of August 2015



MARIAN SNOW
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Wilson, NC 27893
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